

Mayor's Initiative to Combat Human Trafficking

March 27, 2019

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March 27, 2019

Dear Friends.

Our hearts are moved and our spirits touched by the increasing victimization of our children and families by those engaged in enslaving the vulnerable through human trafficking. I have made the fight against human trafficking a top priority for my administration. This battle requires the resources, ingenuity, commitment and hard work of our whole community.

In recent years the threat of trafficking has increased as gangs have found it to be more profitable than selling drugs. And, with increasing use of social media for recruitment, traffickers now threaten each of our neighborhoods and every one of our homes. All of our daughters and sons are at risk, and this is simply unacceptable.

Fortunately, we've seen law enforcement recalibrate their approach in the last decade by focusing on arresting the traffickers and recognizing those being trafficked as victims. The most exciting development I have witnessed is the growing community-wide partnership among law enforcement, schools, faith-based organizations, congregations, and an effective network of non-profit organizations all dedicated to preventing human trafficking and rescuing and restoring victims.

In the summer of 2018, I called together a group of leaders representing this vibrant and desperately-needed anti-trafficking movement to look at five key areas: enforcement, prevention and education, data and networking, labor trafficking, and resourcing. The work of this group has given me even greater hope that a unique, community-wide, collaborative approach is emerging here in Fresno that is not only gaining momentum in terms of impact, but also deserving of our continued support and investment.

This report shares some of the insights, goals, action steps and points of progress of this hopeful initiative. We are seeing this as an emerging practical blueprint to collaboratively combat trafficking in our city and surrounding communities.

I want to express my special thanks to the leaders serving on each of the five committees for their compassion and vision, their determination and practicality, and most of all for their love for our City and the most vulnerable members of our community.

It is my hope that in reading this, you will find a way for you, your family, congregation, business or organization to join in this critical work. By working together, we can—and we must—relentlessly fight this fight together for the sake of our children and families.

Sincerely,

Lee Brand

Mayor, City of Fresno

Brand

BACKGROUND

Every day on the streets of our city and behind seemingly legitimate business enterprises, people are living in bondage. Some come from outside our community; others come from outside of our country, but most come from our own schools and neighborhoods. Human trafficking represents modern-day slavery and involves the use of force, fraud or coercion to obtain labor, services or a commercial sex act.

In 2017, Vice-Intel investigative efforts led to nineteen suspected human traffickers being arrested and prosecuted. Thirty-nine victims were identified and referred to services. In addition, since 2010, twenty-three traffickers were sentenced to prison in state and/or federal court with lengthy sentences, up to fifty-years due to human trafficking affiliations. But we need more.

In 2017, Fresno County District Attorney Lisa Smittcamp created the Human Trafficking Prosecution Unit in which prosecutors have been able to secure important human trafficking convictions. In addition, fifteen active service agencies have treated human trafficking victims for years.

Because human trafficking is a top priority for Mayor Brand, he called together leaders from law enforcement, the District Attorney's office, child welfare, nonprofit organizations and others with the charge to collaboratively look at ways to strengthen our community's efforts in combating human trafficking.

The intent of the Mayor's Human Trafficking Initiative is to bring together all agencies and departments that seek to expose, prosecute and care for those who have experienced human rights violations associated with trafficking and keep Fresno on the path to securing community wellbeing for all.

The initiative is divided into five subcommittees that address key parts of the anti-human trafficking process ranging from preventative awareness trainings to data tracking initiatives to enforcement in an effort to scale up our community's response to these crimes.

These subcommittees are made up of dedicated individuals who are seeking to eradicate human trafficking in the greater Fresno area through specific leadership roles tailored to their talents.

Each leader of the five subcommittees has led their group's efforts in developing an action plan for improving their area of service and expertise. This collaborative approach has allowed for idea sharing, encouragement, and uniform standards in which each committee is helping to further Fresno's commitment to human trafficking.

¹ Fresno Police Department 2017 Annual Report

² Fresno Police Department 2013 Annual Report

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Anti-Human Trafficking Subcommittees:

- 1. Enforcement
- 2. Prevention and Education
- 3. Data and Networking
- 4. Labor Trafficking
- 5. Resourcing the Initiative

Each committee developed their recommendations for their specific service areas by asking these questions:

- What is the scope and nature of this problem in Fresno?
- What are activities in this critical area deserving maintenance of effort?
- What are best practices in this critical area deserving application in Fresno?
- What are the goals, action steps and signs of progress to date in each subcommittee area?

Limitations of these Anti-Human Trafficking Subcommittee Reports:

There are many additional points of progress that have been achieved by the partners in the human trafficking service community that deserve to be recorded but were not due to the limitations of this first report. It is hoped that with increased resources, a wider sampling will be reported in the future. This report is a living document, a work in progress.

If you would like to share a point of progress to be included in the second edition of this report, please send that information to: H. Spees, Director, Strategic Initiatives, Office of Mayor Lee Brand, H.Spees@fresno.gov

Anti-Human Trafficking Subcommittee Reports:

1. ENFORCEMENT

a. Committee Members

The Enforcement Committee includes:

- Sgt. Curt Chastain, Vice/Intel Unit, Fresno Police Department (retired 2019)
- Sgt. Sean Biggs, Vice/Intel Unit, Fresno Police Department
- Police Chief Jerry Dyer, Fresno Police Department
- Jaime Magallon, Special Agent, Federal Bureau of Investigation
- Miiko Anderson, Senior Deputy District Attorney, Fresno County District Attorney's Office
- Katie Doerr, Chief Assistant, City Attorney, City of Fresno
- Sarah Johnston, Program Manager, Fresno EOC Central Valley Against Human Trafficking (CVAHT)

b. Committee Goal

Reduce human trafficking through increased enforcement and improved legislation.

c. Action Steps

- 1. Develop a comprehensive, place-based and replicable approach to dismantling human trafficking in a specific high-activity area.
- 2. Address massage parlors in a way that enforces laws and disincentives trafficking and illegal sexual activities.
- 3. Strengthen legislation.
- 4. Expand law enforcement capacity.

d. Progress to Date

- 1. Developed a comprehensive, place-based and replicable approach to dismantling human trafficking in a specific high activity area.
 - i. Chose Parkway Drive.
 - ii. Developed an initiative that included motel owners, Code Enforcement, Neighborhood Revitalization, Fresno Police Department, the Mayor's Office and local City Council Member.
 - iii. Organized a Motel Owners Association.
 - iv. Enforcing building codes.
 - v. Executing targeted enforcement operations (See Attachment # 1 "Prostitution Sting on Parkway Drive Yields 25 Arrests").
 - vi. Plans to replicate on Blackstone Corridor.

- 2. Address massage parlors in a way that enforces laws and simultaneously disincentives' trafficking and illegal sexual activities.
 - i. Executed a reverse sting operation arresting the operator, placing a Southeast Asian police officer as receptionist, arresting over 15 "customers" within span of a few hours, now being processed through the District Attorney's office. Identified multiple workers in their 20's.
 - ii. Utilize Prostitution Abatement Rehabilitation Program with "johns," or buyers of commercial sex, as well as Operation Reveal, posting pictures online, for repeat offenders.

3. Strengthen legislation

- Massage Parlors are no longer allowed by-right, they must now obtain a Conditional Use Permit (CUP) to operate (FMC 15-1202).
- ii. Single Room Occupancy standards were adopted and effective January 9, 2016 (FMC 15-2757).
- iii. Changes to the code relating to how massage businesses operate are drafted. The new ordinance, once passed, will create stronger regulations with heavier consequences for human trafficking violators.
- iv. Changes to the Hotel Registration ordinance are drafted. The new ordinance, once passed, will create stronger regulations with heavier consequences for human trafficking violators.

4. Expand law enforcement capacity

- i. Inventoried current Fresno Police Department Vice Intel Unit staff as 1 sergeant, 6 other full-time officers (3 of these are permanently assigned other duties, i.e., intelligence and casinos.)
- ii. Assessed need for an additional 4 officers and 1 criminal analyst trained in the recognition and response to human trafficking.

2. PREVENTION AND EDUCATION

a. Committee Members

The Prevention and Education Committee includes:

- Rodney Lowery, Executive Director, Fresno Police Chaplaincy
- Danielle Nieto, Social Work Supervisor, Fresno County Department of Social Services Child Welfare
- Stacy Gomez, Director of Legal Services, Marjaree Mason Center
- Richard Burrell, Director, Live Again Fresno
- Torella Minor, Director, Mollie's House
- Sarah Johnston, Program Manager, Fresno EOC, CVAHT

b. Committee Goal

Reduce human trafficking through prevention and education.

c. Action Steps

- 1. Strengthen primary prevention to children in early education.
- 2. Provide secondary prevention services for the victims of childhood trauma or others susceptible to trafficking.
- 3. Provide tertiary prevention/intervention/recovery services to victims of trafficking.
- 4. Develop a comprehensive information network on human trafficking that connects law enforcement, education, and other child-centered agencies.

d. Examples of Progress to Date

- 1. Strengthen primary prevention to children in early education.
 - i. Fresno Police Chaplaincy reports progress in their program of providing soft skills to elementary age young people to resist trafficking, teaching kids coping mechanisms so they don't fall prey. This program, now in 45 schools including recently added Washington Union School district, reaches 4,500 kids per week for 36 weeks of the 40 week school year. "This classroom program compliments the districts' commitment to fully developing a child's potential by including social-emotional learning," says Executive Director Rod Lowery. The program just completed the first coloring book on social-emotional learning of its kind.
 - ii. Central Valley Justice Coalition educated 2,504 individuals during the first two months of the year with anti-human trafficking presentations and classes. 1,541 of those individuals were youth, aged 12 to 18,

significant increase over last year, in large part to the ArtVenture Academy³ collaborative choosing the theme of human trafficking for 2019.

- 2. Provide secondary prevention services for the victims of childhood trauma or others susceptible to trafficking.
 - Fresno Police Chaplaincy (FPC) also reports that Fresno Police
 Department averages 500-700 events of childhood trauma per
 month, and this does not register how many children are impacted by
 each event.

FPC is working with the Fresno Police Department (FPD) to capture the calls for service where children are exposed to trauma. They are hiring two case managers to monitor all calls through FPD. Research shows that most victims of trafficking have been exposed to trauma at a young age and have never received counseling. This program has the potential to address this population.

Alliant University and Fresno Pacific University's Masters in Family Therapy Program are supplying Masters and PhD level interns to meet with the families identified through this initiative. The next step will be to get a waiver signed when meeting with parents to be able to share a summary of exposure with that child's school within a 72 hour window to allow teachers to understand the trauma that may be causing a student's otherwise unexplainably disruptive behavior.

- ii. Central Valley Justice Coalition has added a staff member who can be an advocate/case manager for youth and adults who don't yet meet the criteria of trafficking victim but who are extremely in need of someone to inform and intervene. This staff member, Marissa Garcia, is working with youth identified in our prevention classes referred to us by Friday Court, and with women referred by World Impact's emergency response apartment and with persons referred to us from the Fresno EOC.
- 3. Provide tertiary prevention/intervention/recovery services to victims of trafficking.
 - Breaking the Chains provides "hope, healing and restoration to survivors of human trafficking" and has seen the expansion of their services to include addiction treatment, case management, long term

³ ArtVenture Academy, Fresno, CA. Accessed March 25, 2019, http://www.artventureacademy.com

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housing, life skills workshops, education and job training, legal advocacy, supportive counseling, survivor leadership, therapy, education and job support and transitional housing. The organizations physical facilities have expanded as well.

- 4. Develop a comprehensive prevention/education network on human trafficking that connects law enforcement, education, and other child-centered agencies.
 - SB 1227 passed in 2017 requiring schools to provide Human Trafficking Prevention curriculum to all students. Fresno Unified, Central Unified and Clovis Unified all have begun to implement this in their districts through The PROTECT Program.

3. DATA AND NETWORKING

a. Committee Members

The Data and Networking Committee includes:

- Jessica Pitman, Founder/Associate Director, Central Valley Justice Coalition
- Randy White, Executive Director, Fresno Pacific University's Center for Community Transformation (CCT)
- Carlos Huerta, Assistant Director, Fresno Pacific University's Center for Community Transformation (CCT)
- Jocelyn Stevens, Intern, Mayor's Office, City of Fresno
- Ryan Townsend, Executive Director, Central Valley Justice Coalition
- Sarah Johnston, Program Manager, Fresno EOC, CVAHT

b. Committee Goal

The goal of the Data and Networking Committee is to build the capacity of Fresno's anti-human trafficking organizations to serve victims and survivors with greater collective impact.

CCT's Joint Investigative Report of Anti-Human Trafficking Capacities and Practices⁴ in 2016 pointed out the need for communities to have a uniform terminology for use by anti-trafficking organizations and some form of integrated administration of data with a funded backbone institution or person.

c. Action Steps

- 1. Strengthen Fresno's anti-human trafficking service provider network through research and data.
- 2. Develop additional tools such as a uniform terminology and integrated data administration.
- 3. Identify a funded backbone organization to take the initiative toward collective impact.

d. Examples of Progress to Date

- 1. Strengthen Fresno's anti-human trafficking service provider network through research and data.
 - i. An initial research project conducted by the Mayor's Office of Strategic Initiatives and Jocelyn Stevens, an intern with the Office of Mayor Lee Brand, immediately followed the initial launch of this initiative in the summer of 2018. Stevens was tasked with making contact with the anti-human trafficking agencies and outside experts

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⁴ FPPI_Human_Trafficking_Final_RW_12-14-16

to gather input and explore consensus around actionable solutions to form the basis for the design phase of a full action research project. This significant work laid the foundation for that project (see item iii below).

- ii. Fresno EOC secured a 3-year grant which addressed many of the goals of the data and networking committee and ended up funding the next phase of action research through a contract with CCT to more thoroughly engage anti-trafficking programs working in the Central Valley in designing the action research project.
- iii. CCT/Fresno EOC Human Trafficking Data Action Research Partnership was formed in October 1, 2018 and will extend through September 30, 2021. (See Attachment # 2: Pro Forma—CCT/EOC Human Trafficking Date Action Research Partnership)

As of March, 2019, the Partnership is wrapping up preliminary work on the first 6-month timeline segment, which began with the earlier work by Stevens, mining the information gleaned in interviews of 12 agencies to gauge potential consensus on actionable solutions to data problems, identifying types of services provided, examining intake forms, assessing the efficacy and costs of data collection tools, etc. A written report at the end of this segment is currently being written and will be distributed upon completion.

In the remaining two weeks of this first 6-month segment, the project is transitioning to make progress toward the design of the full action research project. This will require additional interviews, this time with a focus on securing involvement in shaping the project as well as participation agreements from as many agencies as possible as to the research goals.

- 2. Develop additional tools such as a uniform terminology and integrated data administration.
 - i. Through the initial stages of research noted above, it has been discovered that the network will probably not require an expensive data tool. Another emerging realization is that the network will not require an "online case file," but rather what is needed is a simplified data tool managed by a centralized researcher/institution. Additionally, a longitudinal study which tracks victims over time will be explored.

- 3. Identify a funded backbone organization to take the initiative toward collective impact.
 - Research shows that collective impact initiatives require a backbone organization (See Stanford Social Innovation Review's publication on collective impact, Keevil and Martin, "How to Organize Alliances of Multiple Organizations: Part 1.")
 - ii. The Office of Mayor Lee Brand, for the purposes of this initiative, has requested that Fresno EOC act as the backbone organization for this initiative. This is in light of their recognized role since 2009 in successfully serving the network of anti-trafficking organizations in the Central Valley and their ability to secure resources for this work. The Mayor's Office realizes that the stakeholders in the anti-human trafficking network will at some time need to determine the long-term role and responsibilities of their backbone organization.

4. LABOR TRAFFICKING

a. Committee Members

The Labor Trafficking Committee includes:

- Lynette Gonzales, Deputy District Attorney, Human Trafficking Unit
- Mario Gonzalez, Deputy Director, Centro La Familia, Advocacy Services
- Shari Hall, HT Investigator, District Attorney's Office
- Travis Tubandt, HT Intern, District Attorney's Office
- Deanna Goodman, Agent, Federal Bureau of Investigation
- Steven Kornaros, Agent, Federal Bureau of Investigation
- Rebeca Hernandez, Consulate of Mexico
- Manuel Flores, Consulate of Mexico
- Sarah Johnston, Program Manager, Fresno EOC, CVAHT

b. Committee Goal

The Goal of the Labor Trafficking Committee is to raise the awareness and sense of urgency of this particular type of trafficking and build capacity among agencies to collaborate in its elimination.

According to Lynette Gonzales, Deputy District Attorney, Human Trafficking Unit, out of all types of human trafficking, labor trafficking might be "the toughest nut to crack" for four reasons: "victims do not self-identify, victims are often working in the context of a private home and therefore isolated, victims tend to have immigration issues and fear law enforcement and enforcement agencies often do not know how to identify labor trafficking."

c. Action Steps

- 1. Raise Awareness among victims and community points of contact for victims of trafficking
 - i. Successfully prosecute a local, high-profile labor trafficking case.
 - ii. Provide training and education to medical professionals to be a point of contact for all victims of trafficking.
 - iii. Create PSA's in the language of the potentially targeted victims of trafficking and distribute to their preferred local media outlets. (ex. radio--KBIF 900 AM and television—Univision, etc.)
 - iv. Provide training and education to other agencies that might encounter a potential victim so they can identify trafficking activity or signals.

2. Victim Advocates

- i. Hire victim advocates who speak victims' languages and are versed in collective culture, shaming, immigration issues and other barriers to victims' coming forward.
- ii. Obtain electronic resources to help local officers, first responders with initial contact of workers in the massage parlor industry and other trafficking situations who only speak Chinese, as this language is one of the largest barriers in tackling the issue.
- 3. Build agency and organizational collaboration to fight labor trafficking.
 - Establish a labor trafficking task force including local law enforcement, code enforcement, the State Labor Commission, the Consumer and Environmental Protection Units, Department of Homeland Security, the FBI and others.
 - ii. Hold monthly trainings similar to the California Highway Patrol's "El Protector" program in target areas.
 - iii. Develop more stringent ordinances for massage parlors.
 - iv. Develop a comprehensive information network on human trafficking that connects law enforcement, education, and other child-centered agencies.

d. Examples of Progress to Date

- Raise Awareness among victims and community points of contact for victims of trafficking
 - i. A local, high-profile labor trafficking case was successfully prosecuted marking a breakthrough with significant media coverage⁵
- 2. Victim Advocates

i. No progress to report.

- 3. Build agency and organizational collaboration to fight labor trafficking.
 - More stringent ordinances for massage parlors are being developed by the City of Fresno.

⁵ "Prosecutors rack up Fresno County's first ever human trafficking conviction," Fresno Bee, August 31, 2018. Accessed March 25, 2019, https://www.fresnobee.com/news/local/crime/article217677925.html

5. RESOURCING THE INITIATIVE

a. Committee Members

The Resourcing the Initiative Committee includes:

- Mayor Lee Brand, City of Fresno
- H. Spees, Director of Strategic Initiatives, Fresno City Office of the Mayor
- Misty Gattie-Blanco, Director, Fresno EOC
- Sarah Johnston, Program Manager, Fresno EOC, CVAHT

b. Committee Goal

The Goal of the Resource Committee is to plan for and contribute to sustainable funding of the collective impact strategy for combating human trafficking in Fresno County.

c. Action Steps

 Identify and secure short and long term funding for Fresno's collective impact strategy to combat human trafficking.

d. Examples of Progress to Date

- Identify and secure short and long term funding for Fresno's collective impact strategy to combat human trafficking.
 - i. Mayor Lee Brand is advocating for the support and funding of the activities of this initiative going forward through several means including support of the fund development efforts of organizations involved in this initiative, active pursuit of federal and state grant funding for personnel, projects and activities related to fighting human trafficking and through future funding opportunities including the Marijuana Tax (Measure A, 2018).
 - ii. Fresno EOC was awarded a three-year grant for comprehensive services for all victims of human trafficking from the Department of Justice Office of Victims of Crime. Under this funding Fresno EOC is collaborating with Centro La Familia Advocacy, Inc. and Fresno Pacific University.
 - iii. Fresno EOC is re-applying through funding from the California Governor's Office of Emergency Services Human Trafficking Victims Assistance Program. Under this funding Fresno EOC is collaborating with Centro La Familia Advocacy, Inc. and Breaking the Chains.
 - iv. Fresno EOC is applying for further funding from the Department of Justice Office of Victims of Crime for integrated services for all minor victims of human trafficking. For this funding Fresno EOC is

- collaborating with Breaking the Chains and Family Healing Center.
- v. Fresno County Department of Behavioral Health has ear marked funding to provide services for identified human trafficking victims and at-risk youth. This funding is to be released Summer 2019.

ROSTER OF PARTICIPANTS

Beauty for Ashes

Breaking the Chain

Catholic Charities

Central Valley Community Foundation

Central Valley Justice Coalition (faith-based)

Centro la Familia

City of Fresno Mayor's Office

City of Fresno Attorney's Office

City of Fresno Development and Resource Management Dept.

City of Fresno Police Department / Vice Unit

Federal Bureau of Investigation

Fresno Pacific University's Center for Community Transformation

Fresno County Department of Behavior Health

Fresno County Department of Social Services Child Welfare

Fresno County District Attorney's Office

Fresno County Office of Education

Fresno EOC Sanctuary and Support Services, Central Valley Against Human Trafficking

Central Valley Freedom Coalition

Fresno Police Chaplaincy

Live Again Fresno

Made for Them

Marjaree Mason Center

Mollie's House

Saint Agnes Medical Center

ATTACHMENT #1

News Line Update – March 13, 2019 Prostitution Sting on Parkway Drive Yields 25 Arrests

On Wednesday, March 13, 2019 an undercover Operation was launched on Parkway Drive in response to prostitution activity and human trafficking. This collaborative project to address blight and illegal activity involved the Southwest Investigations Unit, Vice Unit, City of Fresno Neighborhood Revitalization Department, Code Enforcement and the Motel owners on Parkway Drive. During the undercover Operation, Detectives contacted and arrested dozens of females known for prostitution. Detectives also arrested over 25 men on suspicion of soliciting prostitution during the undercover sting. Thirty officers took part in this operation.

The Fresno Police Department would like to remind the public that Crime Stoppers has enhanced the rewards for information related to gang members who are involved in narcotic sales, firearm possession, and human trafficking. The new campaign consists of the following monetary rewards for anonymous tips. If a gang member is arrested for possessing a handgun, the reward is \$2,000. If a gang member is arrested for possessing an assault rifle, the reward is \$3,000. If a gang member is arrested for human trafficking, the reward is \$3,000 and if a gang member is involved in drug sales, the reward is \$1,000. Anyone with information is urged to call crime stoppers at (559)-498-STOP (7869) with information. Your information is kept confidential.

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ATTACHMENT #2

PRO FORMA

CCT/EOC Human Trafficking Data Action Research Partnership October 1, 2018 – September 30, 2021

Center for Community Transformation (CCT) Fresno Pacific University Dr. Randy White, Lead Researcher Carlos Huerta, Associate Researcher

DATA PROJECT

Conduct Action Research project focused on the question of improving the number and quality of data collected by anti-human trafficking agencies in the Fresno area, and a more accurate picture of the scope of both the problem and the assets/resources addressing it. This research will build on the Fresno Public Policy Initiative launched by the Mayor of Fresno in 2016, and test and initiate aspects of the research recommendations contained therein. Among a number of priorities of the research, this project will focus on interactive and collaborative inputs with members of some 15 anti-human trafficking agencies, involving them in designing and implementing the research. Part of the project will seek to determine how many victims and survivors are being served by the agencies, the extent that there is overlap between them, the nature of the services being provided, the possibility of data sharing, the privacy issues of data sharing, and the possibility of input from victims & survivors regarding the efficacy of the services. Action research methodology will itself help strengthen the anti-HT coalition.

TIMELINE/ACTIVITY

Six-Month Segments/Yr	Activity	Components
0-6 ending	Action research design	Interview all anti-HT agencies plus to gather input and
Mar 30,2019		consensus on actionable solutions to specific challenges.
,		Coordinate with Mayor's anti-HT data process.
		Design full action research project
		Admin/set-up
7-12 ending	Teams doing data collection,	Potential focus: SCOPE - number and nature of
Sep 30, 2019	interviews and reporting	victims/survivors.
		Interpretation and reporting
13-18 ending	Teams doing data collection,	Potential focus: DATA SHARING – agency openness, privacy
Mar 30, 2020	interviews and reporting	issues and overlap
		Design, Interpretation and reporting
19-24 ending	Teams doing data collection,	Potential focus: SERVICES – City-wide array of specific
Sept 30, 2020	interviews and reporting	expertise, gaps, assets, resources.
		Design, Interpretation and reporting
25-30 ending	Teams doing data collection,	Potential focus: VICTIM/SURVIVOR INPUT -
Mar 30, 2021	interviews and reporting	Design, Interpretation and reporting
31-36 ending	Participatory Interpretation	Presentations and evaluation with stakeholders & final report
Sep 30, 2021	& Reporting	
		Total over 36 months